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Attorneys for Defendants
New York Hotel and Motel Trades Council, AFL-CIO
and Peter Ward

Barry N. Saltzman (BS 6533)
 Michael J. D'Angelo (MD 3030)

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

-----	X
TRAN DINH TRUONG, individually and of	:
Behalf of ALPHONSE HOTEL CORP. d/b/a	:
HOTEL CARTER,	:
	:
Plaintiff,	:
	:
-against-	:
	:
NEW YORK HOTEL & MOTEL	:
TRADES COUNCIL, AFL-CIO, and	:
THE OFFICE OF THE IMPARTIAL	:
CHAIRMAN and PETER WARD,	:
	:
Defendants.	:
	:
-----	X

Case No. 1:07-Civ-11383 (RJH)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Affirmation of Barry N. Saltzman, dated March 31, 2008, and the exhibits annexed thereto, the accompanying memorandum of law dated March 31, 2008, and all prior proceedings had heretofore herein, defendants, New York Hotel and Motel Trades Council, AFL-CIO and Peter Ward (collectively the "Union Defendants"), will move before the Honorable Richard J. Holwell, U.S.D.J., at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, for judgment on the pleadings pursuant to Fed. R. Civ. P. 12(c), dismissing plaintiffs' claims against

the Union Defendants in their entirety and with prejudice, and granting such further relief as the Court may deem just and proper.

Dated: New York New York
March 31, 2008

Respectfully submitted,

PITTA & DREIER, LLP

By: 

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